

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	Case No: 21-CR-40039-SMY
)	
MINGQING XIAO)	
)	
Defendant.)	
)	

**DEFENDANT MINGQING XIAO’S SUPPLEMENTAL AND AMENDED CONSENT
MOTION FOR MODIFICATION OF RELEASE CONDITIONS**

Now comes Defendant Mingqing Xiao (“Defendant” or Dr. “Xiao”), by and through his attorneys, to supplement his Motion for Modification of his Release Conditions (ECF No. 172; *see also* ECF Nos. 14; 112) with further detail regarding his proposed travel, pursuant to the Court’s May 16, 2022 Order (ECF No. 173). Moreover, Dr. Xiao, amends this Motion to modify the dates of travel and to include a request for permission to travel to Indiana. In support of this Motion, Dr. Xiao provides the following:

1. Pursuant to Dr. Xiao’s Release Conditions, “[t]ravel is restricted to the state of Illinois and ED/MO for attorney appointments. All requests for travel will require prior approval from the Court.” (ECF No. 14).

2. Pursuant to the Court’s March 28, 2022 Order granting Dr. Xiao’s Consent Motion, Dr. Xiao’s Release Conditions were modified to permit his travel to Missouri for the purpose of attorney appointments and medical appointments for himself and his immediate family members (ECF No. 112).

3. Dr. Xiao makes the instant travel request because his minor daughter (“Ms. Xiao”) has earned a finalist position in the 2022 National Speech & Debate Tournament (“the

Tournament”), hosted by the National Speech and Debate Association (NSDA),¹ in Louisville, Kentucky, from June 12-17, 2022. Due to Dr. Xiao’s wife’s ongoing medical condition, she is not able to transport their daughter to and from the competition. Dr. Xiao, therefore, respectfully requests permission to do so.

4. As NSDA’s tentative schedule (attached hereto as Ex. 1) provides, Tournament registration and events begin at 9:00 a.m. on June 12, 2022 at the Kentucky Exposition Center (“Expo Center”), 937 Phillips Ln., Louisville, KY 40209. The competition rounds will be held between June 13-17, 2022 at local Louisville high schools and elementary schools (*See* Ex. 2) with schedules ranging between approximately 8:00 a.m. and 8:00 p.m. The Tournament will conclude with an award ceremony on June 17, 2022 at 6:30 p.m. at the Kentucky Expo Center.

5. Dr. Xiao’s proposed travel would first include driving Ms. Xiao to her team’s hotel, Quality Inn & Suites, 111 Enterprise Way, Sellersburg IN 47172, on Sunday June, 12, 2022², after which he would return to his home in Illinois.³ Dr. Xiao would then pick Ms. Xiao up from the Kentucky Expo Center, on either Friday, June 17, 2022 or Saturday, June 18, 2022, depending on how far she progresses in the competition and if she enters the final award competition, and would return with her to his home in Illinois.

6. WHEREFORE, we respectfully request that Dr. Xiao’s Release Conditions be modified to permit him to travel to Kentucky and Indiana during the period of June 12-18, 2022

¹ <https://www.speechanddebate.org/national-tournament-2022/>

² Dr. Xiao’s initial Motion (ECF No. 172) included a request that he be permitted to travel between June 11-18, 2022. However, upon further consultation with Ms. Xiao about the Tournament parameters, we hereby amend his Motion to include a request to permit Dr. Xiao travel between June 12-18, 2022.

³ Dr. Xiao’s initial Motion (ECF No. 172) included a request that he be permitted to travel to Kentucky. Upon further consultation, Dr. Xiao learned that Ms. Xiao’s school representatives selected this Quality Inn, which is located in Indiana, approximately 16 miles from the Kentucky Expo Center (*See* Ex. 3), for the team’s accommodations based on price and room availability. Dr. Xiao did not participate in the selection of these accommodations. In light of this information, we hereby amend his Motion to include a request to permit Dr. Xiao to travel to Indiana for the limited purpose of transporting Ms. Xiao to her hotel.

for the purpose of transporting his daughter to and from the competition, and to permit him the ability to travel to his daughter in the event of an emergency during the competition. Dr. Xiao's Probation Officer, Mr. Schuyler J. Stephens, as well as the Government, by AUSA Scott Verseman, have no objection to this Motion.

Dated: May 23, 2022

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on May 23, 2022 I electronically filed Defendant's Supplemental and Amended Motion for Modification of Release Conditions with the Clerk of Court using the CM/ECF system which will send notification of such filing to all counsel of record, including:

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